NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

EPA

DWM-[illegible]

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: Allied Signal / Bendix

FILE NUMBER: 02-62-04

VHT FACILITY FILE NUMBER: _____

PERMIT #: _____

REGION: MFO

INSPECTION DATE: 12-6-89 / 12-7-89

JAN 03 RECD

INCIDENT/CASE NUMBER: _____

INSPECTION TYPE: Generator

RESPONSIBLE AGENCY CODE: MFO

INSPECTOR'S NAME: Jodie M. Stein

INSPECTOR'S AGENCY: State

INSPECTOR'S BUREAU: DHWM

EPA ID NUMBER: NJD078714433

ADDRESS: Rt 46
Teterboro, NJ 07608

LOT: 1+2 BLOCK: 4

1+2 - 4

COUNTY: Bergen

FACILITY PERSONNEL: MARK Schwind
MATT Watson

TELEPHONE #: _____

OTHER STATE/EPA PERSONNEL: _____

REPORT PREPARED BY: Jodie Stein

REVIEWED BY: MSterling

DATE OF REVIEW: 2/6/90

REVISION: 3
01/88

TIME IN: 8:30 / 8:42

TIME OUT: 4:00 / 4:50

PHOTOS TAKEN (__) YES (✓) NO IF YES, HOW MANY? _____

SAMPLE TAKEN (__) YES (✓) NO NO. OF SAMPLES _____

NJDEP SAMPLE ID#: _____

MANIFESTS REVIEWED (✓) YES (__) NO

Number of manifests in compliance 274

Number of manifests not in compliance 1

List manifest document numbers of those manifests not in compliance.

CT B 0075809* ← rescinded

NJ:A 0480657

-A1-

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS:

On 12/6/89 + 12/7/89 I conducted a RCRA inspection at Allied Signal/Bendix Aerospace Co (hereafter Bendix). The facility personnel I spoke to on 12-6-89 was Mark Schwind, + on 12-7-89 was Matt Watson, both Environmental Engineers.

Bendix is a large facility composed of 3 divisions: ① Flight Systems - this area manufactures materials for civil + military airplanes, such as F16, F15 + DC3 planes, missiles, etc. ② Test Stand Systems - this area makes + assembles test stands. Printed circuit boards come from plant 1 after they're manufactured, go to plant 4, get wired + assembled and then go to Plant 5 for testing. How it works is basically simple. A plane gets pulled in, connected to the stand, + the test stand tells what may or may not be wrong with the plane. ③ Guidance Systems - This is the major area of the facility, although

-AB1-

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

Bendix also has a printed circuit board drilling area if the boards need precision drilling, but no haz. waste is generated here. Printed circuit boards also go into the Potting rooms (see layout diagram) (PLANT I) where they were put into machines and dipped into xylol, and then drip-dried. The xylol formed a hard rubber-like coating. Excess Xylol, or "spent" xylol goes into either a 55 gal. drum or lab packs, and gets shipped out via manifest. The machine uses approx. 5 gal. per machine (2), per month. These machines have hoods, permit #00004. After these boards are dry, they go under an U.V. light to check for imperfections + get baked in electrically induced Ovens. After they're baked, they get washed in a "board washer" machine which uses mild detergents + $H_2O$. The $H_2O$ gets reused because once the board is baked, nothing comes off of it.

Also located in plant I is a highly Classified area where Mr. schwind said

-A10

## SUMMARY OF FINDINGS

**FACILITY DESCRIPTION AND OPERATIONS (continued):**

(4) Chromium Batch
↓
Chromium reduction
↓
neutralization (general)
↓
Flocculation
↓
sedimentation (sludge)
↓
neutralization
↓
discharge into sanitation

(5) General rinse batch
↓
Sedimentation (if any)
↓
discharge into sanitati

The tanks are as follows:
2 sludge (metal hydroxide, waste stream #9) - 5000gal.
1 Alkaline - 3000gal.
1 Acid - 3000 gal
1 Sulfuric Acid - 300 gal
1 Caustic Soda - 200gal.
1 Clarifier tank - 9500gal
1 Flocculation - 350 gal
1 Chromium - 200gal
1 Cyanide - 200 gal
1 Neutralization - 3000 gal

70,000 gallons are discharged into sanitation system daily. The sludge, when one 5000gal. tank is full, it gets tested by Envirite Corp. & pumped out into tanker trucks. Approximately 4000gal. are pumped out every 2-4 months.

-A9-

## SUMMARY OF FINDINGS

**FACILITY DESCRIPTION AND OPERATIONS (continued):**

From here, the tank $H_2O$ gets pumped through pipes into the waste water treatment facility (herein w.w.t.f.) and goes to 5 different treatment areas:

(1) Chelated batch
↓
1st stage
↓
deepfreeze w/ ferrous sulfate
↓
decreasing PH below 4
↓
2nd stage
↓
increase PH w/ Lyme to 9.5
↓
poly sulfide
↓
flocculation
↓
sedimentation (sludge) → lined tank
↓
neutralization
↓
discharge into sanitation

(2) Alkaline batch
↓
Treatment
↓
sludge
↓
pumped out w/ truck

(3) Cyanide Batch
↓
Cyanide distruction → increase PH to 11.5 w/ caustic soda
↓
decrease PH with sulfuric acid
↓
cyanate
↓
nitrogen ← neutral
↓
Flocculation
↓
Sedimentation (sludge)
↓
neutralization
↓
discharge into sanitation.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

Once the board is finished, it may go to the plating house to be plated. General plating goes thru sulfaric anodizing → clean → Patlin (forms black coating on cast iron + steel + is caustic) → SEALed (emerge board to be treated in a tank with vaccuum pressure. Then introduce impregnating materials, pressurize, + then reverse pressure to become air + $H_2O$ tight. Then the resin gets cured to remain in the board. $H_2O$ + alkali detergents are used, + are discharged into the lift station pretreatment facility.)

80-90 percent of Bendix's waste $H_2O$ come from the Printed Circuit board area and the plating house. This waste $H_2O$ goes into the lift station pre-treatment facility into 4 tanks:
Chelated tank (500 gal.) - where metals are forced to stay in suspension.
General rinse $H_2O$ tank (500 gal.)
CHrome rinse $H_2O$ tank (100 gal.)
Cyanide rinse $H_2O$ tank (100 gal)

-A. #1

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

all $H_2O$ rinses go into the Lift station pretreatment facility (to be discussed later.) Everything else is recycled until it is spent + then shipped out as Haz. waste. Once this process is finished, the Silicon boards with copper coating go into a permanginate bath to remove epoxy smears. Then the boards go into the electroless copper, (which builds up the copper coating = waste stream #5) → electrolytic copper → "lead" plating (which forms a mass + removes backing) → reflow area (infra-red system melts lead to seal mass on copper board.) These boards went to each bath down an assembly line. The liquids were all in rectangular tanks of various sizes. The material in each tank was reused for several months until it was spent or evaporated. No specific amount of each was given because it all depended on how much + how many times it was used, etc. However, when it was spent, it got shipped out as haz. waste.

-A 6

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

There is a plating House. Within this area they use copper, nickel, silver, tin plate, cadmium & gold plating. This area generates waste streams # 6, [redacted], 10 & 11.

There is also a Printed Circuit board area within the plating house. Basically, they purchase silicon boards with copper coating. Then a photograph is instilled upon this board via ultra violate light. Then this board goes into an etching bath (etching MACHINE I) for cleaning ~~etching~~ → conveyor → detergent cleaner → $H_2O$ rinse → sodium persulfate (~~waste stream # 2b~~ Approx. 55 gal used every other day.) → $H_2O$ rinse → hot air drying. Once cleaned, the board goes into an etching machine (etching machine II), which uses cupric chloride Cleaners (was ~~testream 2a~~) → Chlorine gas + HCL → Chambers → $H_2O$ rinse → air dry. If the board is made of lead tin, it goes into an alkaline etcher (etching machine III) → alkaline etch (ammonium hydroxide) → $H_2O$ rinse → dry.

-A. 5

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

Freon, acetone, + alcohol/year. The III, T.C.E gets tested in house via 2-30 gal sumps. If its clean, it stays, + if its spent it gets shipped out. This is waste stream # 7

If the component need not be degreased or tumbled, it may go to the paint shop, located in Plant I. (see plant layout diagram.) Components come in dried + get painted according to military specs. Within this room are 3 spray booths, and a few baking ovens. Most of the paints used are either lacquer or enamel, and the constituents are as follows: Xylene, pigments, isopropyl alch., nitrocellulose, toluol alkyd resin, xylol, caster oil, M.E.K, butyl acetate + lead. (The flashpt is 45°.) This gets shipped out in 2 ways: First unused portions are lab packed*, and second out dated paints get shipped (opened or unopened.) This is waste stream # 8. Once the component is painted, it can go to a variety of places - assembly, plating, to the customer, etc.

* waste stream # 12

-A-4

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

There are other machines in machine shops throughout plant I that do milling, grinding etc & generate the cutting oils and machine oils (approx. 5gal/mo.)

Once the components are done from the machines, they can go to a variety of areas. One area is located in the same room, which is the tumbler. Depending upon military specs, these components get entered into the tumbler machines w/ tumbling stones, and detergent & $H_2O$. This detergent/$H_2O$ solution gets discharged into sanitation NJPDES # 0002097, after it is filtered out through a sedimentation basin (CHANGED every 3-5 yrs.) From here, components can go to QA/Q.C.; plating; to painting; or just to the degreaser.

There are 6 degreasers throughout plants 1, 4 & 5, all but 1 is vented. They use freon, Isopropyl alcohol, 1,1,1 trichloroethylene, trichloroethane 113 methylene Chloride, nitromethane, & acetone. They use approx. 600g. of each

-A3-

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

90% of the Haz. waste generated. The Test Stand division is located in plants 4+5. (See PLANT Layout in report.)

There are several processes that generate haz. waste at this facility. In the machine room; there are 7 cutting machines called Le Blond MAKino MC 65 systems, and 5 CNC lathes. Because these machines are high tech. there is a person standing there pushing buttons. Within these machines, there is a $H_2O$ soluble Chemical emulsion K.A. Trim Solve. This material is what runs the machines, and is used as a coolant + lubricant. The trim solve gets recycled in an aboveground resevoir as follows: The trim solve gets entered in the top of the resevoir, centrifuged, reusable oil comes out on the bottom + gets recycled back into the machines. The spent oil gets shipped out as Haz. waste. approx. 5 gal / month This is waste stream #8. These machines do boring, cutting + drilling.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

all 3 divisions are intertwined. In this area, was automated + beryllium maching, gyro + platform assembly, manufacturing of printed circuit boards, hybrid microcircuit production, manufacture + assembly of electrical components, metallurgic + chemical engineering, and acceptance + qualification testing. Within this division, there are also special facilities (Highly Classified areas) that do special tests for the Solid Rocket Booster IEA, for the NASA space shuttle program. Gyroscopic devices, control systems, digital computers, and power supplies are amongst the components used in the Pershing missile. In addition to the components in the pershing missile, components for submarines are manufactured, + Gyrocompasses for rocket launching systems are also manufactured here. The Flight System division + Guidance System Division are located in PLANT I. G.S.D. accounts for

-AB

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

they use very small quantities of freon & isopropyl alcohol, to clean off solderings, (used on rags.) The "spent" or unused portions are shipped out as lab packs.

There are a few Pershing White rooms in PLANT 1 where they assemble gyros, and during this process they use a degreaser (4000 gal. tank) of which 300 gal. are used per month.

There is also a room where they do blue printing, and in this room is a blue line machine which permanently blue prints on material backing. The only haz. waste generated here is ammonia, about 1 gal per month which goes out as a lab pack.

In the engineering annex, components come from plant 1 and get assembled here. For example, application of electrical components, or the need for minor solder cleaning, etc. They use isopropyl alcohol, approx. 1 gal/month kept in a 5 gal. safety can. Any used isopropyl alcohol is accumulated in a 55 gal. drum, or in lab packs (waste stream #12), and sent out.

(A-13)

## SUMMARY OF FINDINGS

**FACILITY DESCRIPTION AND OPERATIONS (continued):**

Within the engineering annex, are also environmental chambers where components are heat, cold, altitude, vibration & electromagnetic tested, but no haz. waste is generated.

In plant 5, the only haz. wastes come from the 2 degreasers, which contain 111 TCE, alcohols, and are changed once a month. 1 degreaser is 10 gal. & 1 is 25 gal. Lab packs of paint thinners & solder dross are also shipped out. The paint thinners also go out in 55 gal. drums (see "paint shop.")

All haz. wastes are picked up at each dept. by John Sebacht, haz. waste materials handler, & brought outside to the haz waste storage area. This area was labeled properly, and was found to be immaculate. All drums were arranged, labeled, dated & in good shape. The haz. waste storage has 2-way radios, beeper, & phones next door. Daily inspections are done and records are kept.

There are 2 Chemical Storage Buildings across & next to the haz. waste storage area where raw materials

**SUMMARY OF FINDINGS**

**FACILITY DESCRIPTION AND OPERATIONS (continued):**

are stored. In this area explosion proof phones are used.

Also on site is a wood-shop & a maintenance machine shop. These shops use degreaser - stoddard solvent. The machine shop also uses small amts. of cutting oils (1 quart/mo) & some motor oil (10 g/yr.) shipped out as Haz. waste.

The Power house, is where the 4 boilers (uses #6 oil) are located, as well as 3 air compressors.

On site there are 5 - 2500 gal. #6 fuel oil underground tanks; 1-5000 gal. above ground tank of $Co_2$ raw material; 2 Liquid nitrogen above ground tanks - 4000 gal + 2000 gal raw mat'l.; 1-750 gal. above ground tank of diesel fuel; a 1-4000 gal. above ground Haz. waste storage tank of Cupric chloride.

Bendix itself has been in existance since 1939, & merged with Allied-Signal in 1982. ECRA became involved in 1985 when 6 underground tanks (4-250 gal. jet fuel & 2-25,000 gal #4 & #6 fuel) were tested & pulled. The ECRA case mgr is Chris Neuffer, who informed me of the active information. However, this case is still [redacted]. There are a few monitoring wells on site also.

SUMMARY OF FINDINGS

**FACILITY DESCRIPTION AND OPERATIONS (continued):**

The facility tour found all areas to be in compliance. As previously mentioned, the haz. waste storage area was immaculate. All drums were arranged 18" apart, labeled, & dated.

The required documents were generally in good order, with 3 exceptions (one later found to be adequate): 2 manifests, #NJA0458657 was missing the TSD & EPA ID number, and CTB0075809 which I originally thought had the wrong waste code/or the wrong waste description. For these, NOV's were issued. After several conversations with the CT.DEP.H.W.M., and a letter submitted to me by Allied-Signal, I learned that the proper waste code, and the proper haz. waste description was indeed correct. A rescission letter was sent to Mark Schwind, on ; with my apology, for manifest # CTB0075809 only. The NOV for the other above mentioned manifest still stands.

The other problem I encountered was the fact that they had no written

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

approval from the Dept. to use an above ground storage tank (4000 gal) for Cupric Chloride (D002). For this, an NOV was issued.

ALL land ban restricted wastes forms were available & attached to manifests appropriately. Therefore, no referrals to USEPA is needed. Any waste sent offsite to facilities are either Lab packs, or minute amounts (.001%) which, if any, are incinerated.

Explain

-B-

**Describe the activities that result in the generation of hazardous waste.**

1) cleaning + degreasing machines - 111, T.C.A., TCE Freon, 113 methylene chloride, nitromethane
2) ~~(A)~~ Etching machine #II process - Cupric chloride HCl,
(B) Etching machine #I - sodium persulfate
(C) Etching machine III - ammonium hydroxide
3) 1112A resist solids - from 1112A resist liquids; removed particles; glycol ethers.

**Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)**

4) 1112A resist Liquids - a cleaner stripper which removes particles; glycol ethers
5) Electroless Copper - a chemical plating solution composed of formaldehyde + sodium hydroxid
6) Pyro Copper - $H_2O$, phosphoric acid, sulfur (copper sulfate), Lead, used in plating.
7) Chlorinates - HCl, etc.
8) Oils + Solvents - Acetone, M.E.K. Alcohol, Aromatic HOC, Ethylene Glycol monoethyl Ether, Methyl isobutyl Ketone, Cutting oil, machine oils
9) metal Hydroxide - generated from the waste water treatment facility
10) Nickel - used in plating
11) Chromic Acid - used in Etching
12) Lab Packs - corrosive mat'l., poison B, Iso Alcohol chemicals, etc

continued

Continued ↓



-B-7

**Describe the activities that result in the generation of hazardous waste.**

**Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)**

9-20-89 2-55 GALLON drums of hydrolic acid (D002) - lime clean-u
10-12-89 2-55 gallon drums of Ammonium nitrate solution (D001)
11-10-89 1-30 gallon cardboard drum of waste chromatic acid clean-up mat'l (D002)
9-28-89 1-55 gallon drum concrete floor clean-up
10/3, 12/5, 12/11, 12/9, 12/15, 12/20 → 10-55 gallon drums of ammonium hydroxides (D002)
11/15, 11/3, 11/17 → 3-55 gallon drums of waste alkaline liquid (D00
11/13, 11/31 10-55 gallon drums 111, Trichloroethane (F001)
11/14, 12/4 2-55 gallon drums Freon (F001)
11/3 1-55 gallon drum of methylene chloride (F001)
12/4 1-55 gallon drum of hydrochloric acid soda ash clean-up (D002)
10/25, 10/31, 11/6, 11/13, 11/20, 11/21, → 10-55-gallon drums of waste oil, N.O.S. (X726)
10/25 1-55 gallon drum of waste thinners, N.O.S (F003)
11/17 2-55 gallon drums of waste alcohol, NOS (F003)

* The above ARE ALL located in the Haz. waste Storage area.

GENERAL

## GENERAL CHECKLIST

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-7.4(a)1 | Does the Generator have an EPA ID number? | ✓ | | |
| **HAZARDOUS WASTE DETERMINATION** | | | | |
| 7:26-8.5(a) | Did the generator test its waste to determine whether it is hazardous? | ✓ | | |
| 7:26-8.5(b) | Did the generator determine the hazardous characteristics based upon knowledge of process? | ✓ | | |
| | Is the waste hazardous? | ✓ | | |
| 7:26-8.5(d) | Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF? | ✓ | | |
| **MANIFESTS** | | | | |
| 7:26-7.4(a)4 | Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1). | | | |
| 7:26-7.4(a)4i | The generator's name, address and phone number. | ✓ | | |
| 7:26-7.4(a)4ii | The generator's EPA ID number. | ✓ | | |
| 7:26-7.4(a)4iii | The hauler(s) name, address phone number and NJ registration. | ✓ | | |
| 7:26-7.4(a)4iv | The hauler(s) EPA ID number. | ✓ | | |
| 7:26-7.4(a)4v | The name, address and phone number of the designated TSD facility. | ✓ | | |
| 7:26-7.4(a)4vi | The TSF's EPA ID number. NJA048637 | | ✓ | |
| 7:26-7.4(a)4v | The name, address and phone number of the designated TSD facility. | ✓ | | |
| 7:26-7.4(a)4vii | The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same? | ✓ | | |
| 7:26-7.4(a)4viii | Special handling instructions and any other information required on the form to be shipped by generator? | ✓ | | |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-7.4(3) | Did the generator describe all N.O.S. wastes in Section J? | ✓ | | |
| 7:26-7.4(a)ix | When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest? | | | ✓ |
| 7:26-7.4(a)5 | Before allowing the manifested waste to leave the generator's property, did the generator: | | | |
| 7:26-7.4(a)5i | Sign the manifest certification by hand? | ✓ | | |
| 7:26-7.4(a)5ii | Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest? | ✓ | | |
| 7:26-7.4(a)5iii | Retain one copy and forward one copy to the state of origin and one copy to the state of destination? | ✓ | | |
| 7:26-7.4(a)5iv | Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator? | ✓ | | |
| 7:26-7.4(a)5v | Give the remaining copies of the manifest form to the hauler? | ✓ | | |
| 7.26-7.4(f) | Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis) | ✓ | | |
| 7:26-7.4(h)1 | Has the generator received signed copies of portion B (from the TSD facility ) of all manifests for waste shipped off site more than 35 days ago? | ✓ | | |
| 7:26-7.4(h)1 | If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation? | | | ✓ |
| 7:26-7.4(h)2 | Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago? | | | ✓ |

Made copies of state copy + sent to the state. ←

7:26-9.3 Accumulation Time

How is waste accumulated on site?

(✓) Containers - 559 drums
(__) Tanks (greater than 90 days)
(complete HWMF (TSD) Facility Checklist)
(__) Tanks (less than 90 days)
(✓) Above ground - Cupric Chloride
(__) Below ground
(__) Surface impoundments
(complete HWMF (TSD) Facility Checklist)
(__) Piles (complete HWMF checklist)

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.3(a)1 | Is waste accumulated for more than 90 days? | — | ✓ | — |

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

| Containers | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.4 | What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone). 44 - 55 GAL. drums | — | — | — |
| 7:26-9.4(d)2 | Do the containers appear to be in good condition, not in danger of leaking? | ✓ | — | — |
| | If no, describe the problem (include number of containers involved.) | | | |
| 7:26-9.4(d)4i | Are all containers securely closed except those in use? | ✓ | — | — |
| 7:26-9.4(d)4iii | Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking? | ✓ | — | — |
| 7:26-9.4(d)4iv | Are containerized hazardous wastes segregated in storage by waste type? | ✓ | — | — |
| 7:26-9.4(d)4v | Is every container arranged so that its identification label is visible? | ✓ | — | — |
| 7:26-9.4(d)5 | Is the container storage area inspected at least daily? | ✓ | — | — |
| 7:26-9.4(d)6 | Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line? | ✓ | — | — |
| 7:26-7.2(a) | Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment? | ✓ | — | — |
| 7:26-9.3(a)3 | Is each container clearly dated with each period of accumulation so as to be visible for inspection? | ✓ | — | — |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-7.2(b) | Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179) | ✓ | — | — |
| **Tanks** (Less than 90 day storage) | | | | |
| 7:26-9.3(b) | Does the generator accumulate hazardous waste on-site in an above ground tank? | ✓ | — | — |
| | If yes, describe the tank(s):<br>1) Capacity 4000 gal<br>2) Shell thickness ← Didn't Know<br>3) Material Construction fiberglass<br>4) Age of tank 8yrs. | | | |
| 7:26-9.3(b) | Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less? 7 0 | — | ✓ Stores Less than 90 days | — |
| 7:26-9.3(b)1 | Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department? | ✓ | — | — |
| 7:26-9.3(b)4 | Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage? | ✓ | — | — |
| 7:26-9.3(b)5 | Is each tank(s) rendered empty (1% or less remaining) every 90 days or less? | ✓ | — | — |
| 7:26-9.3(b)6 | Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility? | ✓ | — | — |
| 7:26-9.3(b)8 | If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is is secondary containment provided for the below grade part? | — | — | ✓ |
| 7:26-10.5(c)1 | Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)? | — | ✓ | — |
| 7:26-10.5(c)2 | Does the generator use appropriate controls and practices to prevent overfilling? | ✓ | — | — |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-10.5(c)2ii | For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation? | | | ✓ |
| 7:26-9.3(b)3 | Does each tank(s) or storage tank area have secondary containment? | ✓ | | |
| 7:26-10.5(d)1 | Is the containment system capable of collecting and holding spills, leaks, and precipitation? | ✓ | | |
| 7:26-10.5(d)1i | Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed? | ✓ | | |
| 7.26-10.5(d)ii | Does the containment system consist of material compatible with the wastes being stored? | ✓ | | |
| 7:26010.5(d)iii | Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation? | | | ✓ |
| 7:26-10.5(d)iii | Is the tank protected from contact with accumulated liquids? covered | ✓ | | |
| 7:26-10.5(d)iv | Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater? | ✓ | | |
| 7:26-10.5(d)2 | Is run-on into the containment area prevented? | ✓ | | |
| | If not, explain. | | | |
| 7:26-10.5(d)3 | Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system? | | | ✓ |
| 7:26-10.5(d)4 | Is spilled or leaked waste removed from the pump or collection area daily? | | | ✓ |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.7(f) | Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be names as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates? | ✓ | | |
| 7:26-9.7(g) | Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities? | ✓ | | |
| 7:26-9.7(h) | Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routed could be blocked by releases of hazardous waste or fires)? | ✓ | | |
| 7:26-9.7(i) | Is a copy of the contingency plan and all revisions to the plan: | | | |
| | 1. Maintained at the facility; | ✓ | | |
| | 2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)? | ✓ | | |
| 7:26-9.7(k) | Is there an employee on site or on call at all times with the responsibility of coordinating, all emergency response measures? | ✓ | | |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-10.5(d)4i | If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter? | ✓ | | |
| 7:26-9.4(g)4 | <u>Personnel Training</u><br><br>Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility? | ✓ | | |
| 7:26-9.4(g)5 | Has facility personnel taken part in an annual review of initial training? | ✓ | | |
| 7:26-9.4(g)2 | Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed? | ✓ | | |
| | Is there written documentation of the following: | | | |
| 7:26-9.4(g)6i | Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job? | ✓ | | |
| 7:26-9.4(g)6ii | A written job description for each position related to hazardous waste management? | ✓ | | |
| 7:26-9.4(g)6iii | A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management? | ✓ | | |
| 7:26-9.4(g)6iv | Documentation of actual training or experience received by personnel? | ✓ | | |
| 7:26-9.4(g)7 | Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment? | ✓ | | |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.6 | Preparedness and prevention | | | |
| | Does the facility comply with preparedness and prevention requirements including maintaining: | | | |
| 7:26-96(b)1 | An internal communications or alarm system? | ✓ | | |
| 7:26-9.6(b)2 | A telephone or other device to summon emergency assistance from local authorities? | ✓ | | |
| 7:26-9.6(b)3 | Portable fire equipment, spill control equipment, and decontamination equipment? | ✓ | | |
| 7:26-9.6(b)4 | Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system? | ✓ | | |
| 7:26-9.6(c) | Is equipment tested and maintained? | ✓ | | |
| 7:26-9.6(d)1 | Is there immediate access to communications or alarm systems during systems during handling of hazardous waste? | ✓ | | |
| 7:26-9.6(e) | Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment? | ✓ | | |
| | If no, please explain. | | | |
| | In your opinion, do the types of waste on site require all of the above procedures, or are some not required? | ✓ | | |
| | Explain. | | | |
| 7:26-9.6(f) | Has the facility made the following arrangements, as appropriate for the type waste handled on site: | ✓ | | |
| 7:26-9.6(f)1 | Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes. | ✓ | | |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.6(f)2 | Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority? | ✓ | | |
| 7:26-9.6(f)3 | Agreements with emergency response contractors, and equipment supplies? | ✓ | | |
| 7:26-9.6(f)4 | Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility? | ✓ | | |
| 7:26-9.6(f)5 | Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually? | ✓ | | |
| 7:26-9.6(f)6 | If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record. | | | ✓ |
| 7:26-9.4(g)8 | Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7? | ✓ | | |
| 7:26-9.4(g)8i | If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement? | | | ✓ |
| 7:26-9.4(g)8ii | Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements? | | | ✓ |
| | If yes, did the owner operator provide those specific local officials with written approval of the exemption? | | | ✓ |

| | | YES | NO | N/A |
|---|---|---|---|---|
| 7:26-9.7 | Contingency Plan and Emergency Procedures | | | |
| 7:26-9.7(a) | Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water? | ✓ | | |
| 7:26-9.7(b) | Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? | ✓ | | |
| 7:26-9.7(c) | Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? | ✓ | | |
| 7:26-9.7(d) | Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq. | ✓ | | |
| | If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section? | ✓ | | |
| 7:26-9.7(e) | Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services? | ✓ | | |

Allied Signal/Bendix

## APPENDIX A

## SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| tetrachloroethylene | ___Yes | X No |
| trichloroethylene | X Yes | ___No |
| methylene chloride | X Yes | ___No |
| 1,1,1-trichloroethane | X Yes | ___No |
| carbon tetrachloride | ___Yes | X No |
| chlorinated fluorocarbons | X Yes | ___No |

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| tetrachloroethylene | ___Yes | X No |
| trichloroethylene | ___Yes | X No |
| methylene chloride | ___Yes | X No |
| 1,1,1-trichloroethane | ___Yes | X No |
| chlorobenzene | ___Yes | X No |
| trichlorofluoromethane | ___Yes | X No |
| 1,1,2-trichloro-1,2,2-trifluoroethane | ___Yes | X No |
| ortho-dichlorobenzene | ___Yes | X No |

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| xylene | X Yes | ___No |
| acetone | X Yes | ___No |
| ethyl acetate | ___Yes | X No |
| ethyl benzene | ___Yes | X No |
| ethyl ether | X Yes | ___No |
| methyl isobutyl ketone | X Yes | ___No |
| n-butyl alcohol | ___Yes | X No |
| cyclohexanone | ___Yes | X No |
| methanol | X Yes | ___No |

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

___Yes X No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| cresols and cresylic acid | ___Yes | X No |
| nitrobenzene | ___Yes | X No |

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

| | | |
|---|---|---|
| toluene | X Yes | ___No |
| methyl ethyl ketone | X Yes | ___No |
| carbon disulfide | ___Yes | X No |
| isobutanol | X Yes | ___No |
| pyridine | ___Yes | X No |

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?

___Yes X No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?

X Yes ___No

If yes, list the constituents.

111 TCA TCE FREON 113 METHYLENE CHLORIDE

(c) Are the constituents used as diluents?

___Yes X No

If yes, list the constituents.

_____

_____

(d) Are the constituents used as extractants?

___Yes X No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?

___Yes ___X___No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?

___Yes ___X___No

If yes, list the constituents.

_____

_____

**If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.**

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)

___X___Yes ___No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of <u>all</u> the constituents in the solvent mixture/blend. For example:

| | |
|---|---|
| 5% | methylene chloride |
| 2% | trichloroethylene |
| 25% | 1,1,1-trichloroethane |
| <u>68%</u> | mineral spirits |
| 100% | |

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains <u>only</u> F003 constituents, it is a listed waste. For example:

| | |
|---|---|
| 33% | acetone |
| 16% | methanol |
| <u>51%</u> | ethyl ether |
| 100% | |

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

| | |
|---|---|
| 50% | xylene (F003) |
| 12% | TCE (F001) |
| 38% | mineral spirits |
| 100% | |

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

## APPENDIX B
## TREATMENT STANDARDS FOR F-SOLVENTS

| F001-F005 SPENT SOLVENTS | CONCENTRATION (IN MG/L) WASTEWATERS | OTHER WASTES |
|---|---|---|
| Acetone | 0.05 | 0.59 |
| N-butyl | 5.0 | 5.0 |
| Carbon disulfide | 1.05 | 4.81 |
| Carbon tetrachloride | .05 | .96 |
| Chlorobenzene | .15 | .05 |
| Cresols (and cresylic acid) | 2.82 | .75 |
| Cycohexanone | .125 | .75 |
| 1,2-dichlorobenzene | .65 | .125 |
| Ethyl acetate | .05 | .75 |
| Ethyl benzene | .05 | .053 |
| Ethyl ether | .05 | .75 |
| Isobutanol | 5.0 | 5.0 |
| Methanol | .25 | .75 |
| Methylene chloride | .20 | .96 |
| Methylene chloride (from the pharmaceutical industry) | 12.7 | .96 |
| Methyl ethyl ketone | 0.05 | 0.75 |
| Methyl isobutyl ketone | 0.05 | .33 |
| Nitrobenzene | 0.66 | 0.125 |
| Pyridine | 1.12 | 0.33 |
| Tetrachloroethylene | 0.079 | 0.05 |
| Toluene | 1.12 | 0.33 |
| 1,1,1-Trichloroethane | 1.05 | 0.41 |
| 1,2,2-Trichlor 1,2,2-trifluoroethane | 1.05 | 0.96 |
| Trichloroethylene | 0.062 | 0.091 |
| Trichlorofluoromethane | 0.05 | 0.96 |
| Xylene | 0.05 | 0.15 |

Inspector: Jodie Stein
Address: 2 Babcock Pl
W. ORANGE NJ
Telephone No: 669-3960

# RCRA LAND DISPOSAL RESTRICTION
# GENERATOR CHECKLIST

## I. HANDLER IDENTIFICATION

A. Handler Name: Allied Signal / Bendix Rt 46 B. Street (or other identifier)

C. City: Teterboro D. State: NJ E. Zip Code: 07608 F. County Name: Bergen

G. Nature of Business; Identification of Operations: SIC Code(s): Aerospace

H. EPA ID #: NJD078714443

I. Handler Contact (Name and Phone Number): MARK Schwind / MATT WATSON

## II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following vastes?

(i) F001, F002, F004, or F005 ✓ Yes ___ No

(ii) F003 ✓ Yes ___ No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? N/A

___ Yes ___ No

b. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Reports ___ other (specify) ✓ MANIFESTS.

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent vastes, if such vastes vere not identified by the facility previously. If you are concerned that P-solvent vastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identfying potentially

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: _____

2. Dioxin wastes

a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ___Yes ✓No
(ii) F028 ___Yes ✓No

[F-solvent BDAT standards are presented as Appendix B]

3. California Waste Identification

a. Does the facility handle any of the following wastes?

(i) D002 ✓Yes ___No
(ii) D004 - D011 ✓Yes ___No

b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ✓Yes ___No

[California waste standards are presented as Appendix C]

c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ✓Yes ___No

d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]? ✓Yes ___No*

e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ✓Yes ___No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste? ___Yes ___No

*/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

**Comments**

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

_____

f. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Report ___; other (specify) ✓. WASTE ANALYSIS SHEETS

4. First Third Waste Identification

a. Does the generator handle any of the vastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here:
F006

b. Does the generator handle any soft-hammer vastes (Appendices D-1, D-2, and F)? If so, list those vastes: → Treat W.W. ON Site.
P015, P030, U188, P105, etc.
See Attached Copy

c. Are any of the soft-hammered vastes California vastes (see Appendix G)? ✓Yes ___No

If yes, the vastes must meet BDAT standards prior to disposal.

d. Has the Regional Administrator received demonstrations/certifications for all soft hammered vastes to be land disposed [§268.8(a)(2)]? ___Yes ___No* N/A - ALL Wastes are incinerated except for occasional Lab Packs which are treated

e. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Report ___; other (specify) ✓. Certification Letter

B. **BDAT Treatability Group - Treatment Standards Identification**

1. Does the generator mix restricted vastes with different treatment standards for constituents of concern? ___Yes ✓No

2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ___Yes ___No*

*/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

**Comments**

3. F Solvents - -

   a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?

   ✓ Yes ___ No*

4. California Wastes

   a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?

   ___ Yes ___ No* N/A

5. First Third Wastes

   a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?

   ✓ Yes ___ No*

   b. Does the facility handle K061 wastes?

   ___ Yes ✓ No

   If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?

   ___ Yes ___ No*

   c. Does the facility handle K101 or K102 wastes?

   ___ Yes ✓ No

   If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?

   ___ Yes ___ No*

   d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

   ___ Yes ✓ No

*/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

C. Waste Analysis

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

They do testing but not disposal

a. Knowledge of wastes ___Yes ___No

(i) List wastes for which "applied knowledge" was used:

_____

_____

b. TCLP ___Yes ___No

N/A

(i) List wastes for which "TCLP" was used:

_____

_____

(ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ___Yes ___No

If yes, list: _____

_____

c. Total waste analysis ___Yes ___No

d. If files were retained, describe content and basis of applied knowledge determination:

_____

_____

_____

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

_____

_____

_____

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

*/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]? N/A
___Yes ___No*

2. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(1)]? NO

List those that exceeded standards: _____

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3]
___Yes* ___No

D. Management

1. Onsite management

a. Were restricted wastes managed onsite?
___Yes ✓No

If no, go to "2".

b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?
___Yes ___No

If yes, TSDF checklist must be completed.

2. Offsite Management

a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? ✓Yes ___No*

(ii) Corresponding treatment standard?
✓Yes ___No*

(iii) Manifest number? ✓Yes ___No*

(iv) Waste analysis, if available?
✓Yes ___No

*/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

**Comments**

Identify offsite treatment facilities C.W.M., Newark, Envirite, Conn, AETC, NJ

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:

(i) EPA hazardous waste I.D. number? ___Yes ___No*

(ii) Corresponding treatment standard? ___Yes ___No*

(iii) Manifest number ___Yes ___No*

(iii) Certification regarding waste and that it meets treatment standards? ___Yes ___No*

N/A

NOTHING LAND disposed.

Identify land disposal facilities receiving the BDAT certified wastes _____

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]:

(i) EPA Hazardous Waste Number? ___Yes ___No*

(ii) Corresponding Treatment Standards? ___Yes ___No*

(iii) All applicable prohibitions? ___Yes ___No*

(iv) The manifest number? ___Yes ___No*

(v) The date the wastes are subject to prohibitions? ___Yes ___No*

(vi) Does generator keep records of all notifications/certifications send to offsite facilities? ___Yes ___No*

*/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

**Comments**

List all prohibited wastes for which records are not provided per above [§268.7(a)(b):

_____

_____

N/A

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

_____

_____

d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]:

The EPA Hazardous Waste Number? ✓ Yes ___ No*

Applicable prohibitions? ✓ Yes ___ No*

The manifest number? ✓ Yes ___ No*

Waste analysis data, where available? ✓ Yes ___ No

(i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [§268.33(f)]? ___ Yes ✓ No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

_____

_____

(ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ___ Yes ___ No*

N/A nothing LANDfilled

(iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ✓ Yes ___ No*

They have a copy but not for wastes destined for landfill

(iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)] ✓ Yes ___ No*

* A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

N/A

(v) Did the generator submit the demonstration to the receiving facility upon the intial shipment of the waste [§268.8(a)(3)-(a)(4)]? ___Yes ___No*

(vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]?

___Yes ___No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days?

___Yes ___No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]?

___Yes ___No*

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ___Yes ___No

If yes, list type of treatment unit and processes

_____

_____

_____

If yes, TSDF checklist must be completed.

*/ A potential violation is indicated

L.B. CHECKLIST

4 b

Administrator, USEPA
Region II
Room 900
26 Federal Plaza
New York, N.Y. 10278

March 28, 1989

Dear Sir/Madam,

This letter serves as demonstration and certification required in 40 CFR 268.8(a)1.

Allied-Signal Aerospace Company, Teterboro Facility, ocassionally disposes of small quantities of nonreoccuring chemical wastes from the material and quality assurance laboratories. These chemicals are generally used in metalurgic analysis and have become obsolete due to being out of spec, exceeding shelf life, process change, etc..

Per regulation, wastes of this type are considered to be soft-hammer wastes. The following list of wastes were shipped for incineration to either:

ThermalKEM, Inc.
Route 5
Rock Hill, S.C. 29730

BDT, Inc.
4255 Research Parkway
Clarence, N.Y. 14031

The soft-hammer wastes generated at the Teterboro Facility are as follows:

P010 - ARSENIC ACID

P012 - ARSENIC (III) OXIDE

P030 - CYANIDES (Soluble Cyanide Salts) NOT ELSEWHERE SPECIFIED

P048 - 2,4-DINITROPHENOL

P105 - SODIUM AZIDE

U012 - ANILINE

U019 - BENZENE

U031 - 1-BUTANOL

U037 - CHLOROBENZENE

U044 - TRICHLOROMETHANE

U077 - ETHYLENE DICHLORIDE

U108 - 1,4-DIOXANE

U115 - ETHYLENE OXIDE

U159 - METHYL ETHYL KETONE

U188 - PHENOL

U209 - 1,1,2,2-TETRACHLOROETHANE

U210 - TETRACHLOROETHYLENE

U211 - CARBON TETRACHLORIDE

U219 - THIOUREA

U220 - TOLUENE

U221 - DIAMINOTOLUENE

U226 - 1,1,1-TRICHLOROETHANE

U228 - TRICHLOROETHYLENE

In search for the acceptable treatment facility for these materials, the following facilities have been contacted with the assistance of our environmental service company:

CyanoKEM, Inc.
12381 Shaefer Highway
Detroit, MI 48227

Chemical Waste Management of NJ
100 Lister Ave.
Newark, NJ 17105

I certify under penalty of law that the requirements of 40 CFR 286.8(a)1 have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,

Matthew D. Watson
Environmental Engineer

cc: W. Hooper
T. Russell
J. Bell, AETC
File

Form HWM-004
3/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
~~5th Fl., 401 E. State St., Trenton, N.J. 08625~~
2 Babcock Pl. W. Orange, NJ 07052

## NOTICE OF VIOLATION

ID NO. NJD078714433 DATE 12-15-89

NAME OF FACILITY Allied Signal/Bendix Aerospace Co.

LOCATION OF FACILITY RT 46 Teterboro, NJ 07608

NAME OF OPERATOR Matt Watson

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION ~~NJAC 7:26-7.4(a)4viii: Failure to use proper EPA ID Haz waste code number on manifest~~ * - NJAC 7:26-7.4(a)4vi: No TSD EPA ID number ** NJAC 7:26-9.3(b): Failure to obtain written approval from the Dept. to store Haz. waste in an above ground tank for 90 days or less.

Remedial action to correct these violations must be initiated immediately and be completed by JAN. 14, 1990. Within ~~fifteen (15)~~ 30 days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

NJ DEP Haz. Waste Advisement
(609) 292-8341
EPA-RCRA Hotline
1-800-424-9346

Jackie M Stein
*Investigator, Division of Waste Management*
*Department of Environmental Protection*

* ~~CTD 007580~~ rescinded
** NJA 0418657

Let's protect our earth

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
Metro Regional Office
2 Babcock Place, West Orange, N.J. 07052
(201) 669-3960

*John J. Trela, Ph.D., Director*

January 23, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 088 604 640

Mr. Mark Schwind
Allied - Signal Aerospace Company
Guidance Systems Division
Teterboro, N.J. 07608

Dear Mr. Schwind:

**Subject: Rescind N.O.V. NJAC 7:26 - 7.4 (A) 4Viii**

Dear Mr. Schwind:

I am sending you this letter to rescind the violation NJAC 7:26 - 7.4 (a) 4iii-, use of improper waste code on manifest CTB0075809, August 12, 1987. Based upon review of Allied - Signal case, and submittal of the information provided by Allied - Signal, it is clear that this violation should be rescinded.

Please accept my apology for any inconvenience this may have caused you.

If you have any further questions, please do not hesitate to contact me at (201) 669-3960.

Sincerely,

Jodie M. Stein

Jodie M. Stein
MFO - Hazardous Waste Management

JMS:pg

Proxy Compliance

follows:

9.3(b) - OK

7.4(a)4vi - OK

7.4(a)4vii - Rescinded

Form ADM-012

**MEMO** NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO Yacoub E. Yacoub DATE 1-30-90

FROM Jodie M. Stein thru Jeff Sterling (JS)

SUBJECT Allied-Signal Aerospace inc.

On 1-19-90, I received the follow-up information from Mark Schwind concerning the following violations:

NJAC 7:26-7.4(a)4vi: NO TSD EPA Id number

NJAC 7:26-9.3(b): Failure to obtain written approval from the Dept. to store Haz. waste in an above ground tank for 90 days or less.

NJAC 7:26-7.4(a)4iii: Failure to use proper EPA Id haz. waste code number*.

all areas were adequately addressed and compliance was achieved. *For the NJAC 7:26-7.4(a)4iii; violation was issued, but upon review of submitted material, the violation was rescinded and a rescission letter was sent.